

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-----------------------------------|----------|---|
| UNITED STATES OF AMERICA : | : | CRIMINAL NO. _____ |
| | : | |
| v. : | : | DATE FILED : _____ |
| | : | |
| JASON BROWN : | : | VIOLATION: 18 U.S.C. § 1344 (bank fraud- |
| a/k/a “Jayson T. Browns” : | : | 7 counts); |
| a/k/a/ “Jay Brown” : | : | 42 U.S.C. § 408(a)(7)(B) (false |
| a/k/a “James Brown” : | : | use of a social security number- |
| a/k/a/ “Jason Browne” : | : | 39 counts) |
| | | 18 U.S.C. § 1028(a)(3) (identity |
| | | theft-1 count) |
| | | Notice of additional factors |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. PNC was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

2. From in or around at least August 2001, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud PNC Bank, and to obtain monies, funds, credits and other property owned by and under the custody and control of PNC Bank by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that:

4. Defendant JASON BROWN opened approximately 15 accounts with PNC Bank under the names of people whose identity he had stolen or aliases of JASON BROWN.

5. Defendant JASON BROWN made fraudulent deposits and fraudulently obtained credit in the total amount of approximately \$331,207.37 to fund these accounts. Checks deposited to open and fund the accounts, in whole or in part, were drawn on accounts that were closed or had never existed. Checks deposited were in the names of people whose identity JASON BROWN had stolen or aliases of JASON BROWN

6. After making fraudulent deposits and fraudulently obtaining credit, defendant JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds. The approximate total amount of the withdrawals and the approximate total amount of the fraudulent deposits and the fraudulently obtained credit at PNC Bank are as follows:

| ACCOUNT NAME | ACCOUNT NO. | DEPOSIT/CREDIT | WITHDRAWAL |
|---------------|------------------|----------------|-------------|
| Jayson Browns | 802454833 | \$20,490.00 | \$9,768.57 |
| W. C. | 8605003227 | \$39,771.87 | \$18,421.87 |
| M. C. | 11048109621026 | \$11,034.00 | \$11,034.00 |
| L. D. | 11048109941951 | \$15,0000 | \$12,649.69 |
| A. H. | 11048109750812 | \$22,996.00 | \$8,000.00 |
| D. K. | 8604310583 | \$9,790.00 | \$1,969.19 |
| W. K. | 11048109847775 | \$18,127.00 | \$18,127.00 |
| T. L. | 8604433161 | \$9,000.00 | \$7,161.74 |
| S. L. | 1103048109820312 | \$5,000.00 | \$5,000.00 |
| S. M. | 11048009030728 | \$9,000.00 | \$0 |
| R. M. | 1103048109951091 | \$18,000.00 | \$0 |
| T. P. | 6003048110003957 | \$17,000.00 | \$0 |

| | | | |
|-------|----------------|---------------------|--------------------|
| D. R. | 8501487562 | \$40,000.00 | \$1,750.82 |
| T. S. | 8501632512 | \$15,000.00 | \$0 |
| K. S. | 11048109505487 | \$5,000.00 | \$0 |
| B. U. | 8501807829 | \$35,998.50 | \$501.50 |
| R. W. | 11048109029899 | \$20,000.00 | \$0 |
| R. W. | 11048109367258 | \$20,000.00 | \$0 |
| | TOTAL | \$331,207.37 | \$94,384.38 |

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Philadelphia Federal Credit Union ("PFCU") was a financial institution whose deposits were insured by the Federal Credit Union Share Insurance Fund.

2. From in or around at least August 2001, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud PFCU and to obtain monies, funds, credits and other property owned by and under the custody and control of PFCU by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that :

4. Defendant JASON BROWN opened approximately 12 accounts with PFCU under the names of people whose identity JASON BROWN had stolen or aliases of JASON BROWN.

5. Defendant JASON BROWN made fraudulent deposits and fraudulently obtained credit in the total amount of approximately \$138,553.32 to fund these accounts. Checks deposited to open and fund the accounts, in whole or in part, were drawn on accounts that were closed or had never existed. Checks deposited were in the name of people whose identity JASON BROWN had stolen or aliases of JASON BROWN.

6. After making fraudulent deposits and fraudulently obtaining credit, defendant JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds.

The approximate total amount of the withdrawals and the approximate total amount of the fraudulent deposits and fraudulently obtained credit at PFCU are as follows:

| ACCOUNT NAME | ACCOUNT NO. | DEPOSIT/CREDIT | WITHDRAWAL |
|---------------------|--------------------|-----------------------|--------------------|
| James Brown | 680856 | \$6,790.00 | \$3,083.00 |
| Jason Brown | 661623 | \$3,052.72 | \$1,073.00 |
| Jay Brown | 681503 | \$12,762.32 | \$5,288.00 |
| T. B. | 674038 | \$19,600.00 | \$413.73 |
| R. C. | 669384 | \$18,728.30 | \$296.70 |
| J. H. | 672793 | \$9,500.00 | \$0 |
| M. K. | 606201 | \$15,000.00 | \$0 |
| M. O. | 669324 | \$14,150.00 | \$721.94 |
| L. R. | 681739 | \$4,000.00 | \$1,495.00 |
| R. S. | 671938 | \$9,470.00 | \$452.97 |
| R. S. | 691648 | \$10,500.00 | \$1,877.00 |
| R. W. | 678191 | \$15,000.00 | \$8,908.81 |
| | TOTAL | \$138,553.32 | \$23,610.15 |

In violation of Title 18, United States Code, Section 1344.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this Indictment:

1. E*Trade was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

2. From in or around at least August 2001, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud E*Trade and to obtain monies, funds, credits and other property owned by and under the custody and control of E*Trade by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that:

4. Defendant JASON BROWN opened approximately 8 accounts with E*Trade under the names of people whose identity JASON BROWN had stolen or aliases of JASON BROWN.

5. Defendant JASON BROWN made fraudulent deposits and fraudulently obtained credit in the total amount of approximately \$180,123.83 to fund these accounts. Checks deposited to open and fund the accounts, in whole or in part, were drawn on accounts that were closed or had never existed. Checks deposited were in the name of people whose identity JASON BROWN had stolen or aliases of JASON BROWN.

6. After making fraudulent deposits and fraudulently obtaining credit, defendant

JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds.

The amount of the withdrawals and the amount of the fraudulent deposits and fraudulently obtained credit at E*Trade are as follows:

| ACCOUNT NAME | ACCOUNT NO. | DEPOSIT/CREDIT | WITHDRAWAL |
|---------------|----------------|---------------------|-------------------|
| D. B. | 2008053346 | \$3000.00 | \$0 |
| Jayson Browns | 2007585330 | \$18,121.00 | \$0 |
| Jayson Browns | 63509650544127 | \$4,112.83 | \$55.48 |
| J. H. | 2006486589 | \$25,000.00 | \$0 |
| J. H. | 2006484634 | \$25,000.00 | \$0 |
| R. R. | 2006338251 | \$24,990.00 | \$0 |
| R. S. | 63509650017217 | \$64,900.00 | \$229.48 |
| R. S. | 2007952282 | \$5,050.00 | \$0 |
| R. S. | 2007967819 | \$9,950.00 | \$1,135.00 |
| | TOTAL | \$180,123.83 | \$1,419.96 |

In violation of Title 18, United States Code, Section 1344.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. US Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

2. From in or around at least August 2001, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud US Bank and to obtain monies, funds, credits and other property owned by and under the custody and control of US Bank by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that:

4. Defendant JASON BROWN opened one account with US Bank under the name of Jayson T. Browns, an alias of JASON BROWN.

5. Defendant JASON BROWN made fraudulent deposits and fraudulently obtained credit in the total amount of approximately \$12,500 to fund this account. Checks deposited to open and fund the accounts in whole or in part, were drawn on accounts that were closed or had never existed. Checks deposited were in the name of Jayson T. Browns an alias of JASON BROWN.

6. After making fraudulent deposits and fraudulently obtaining credit, defendant JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds.

The approximate total amount of the withdrawals and the approximate total amount of the fraudulent deposits and fraudulently obtained credit at US Bank are as follows:

| ACCOUNT NAME | ACCOUNT NO. | DEPOSIT/CREDIT | WITHDRAWAL |
|---------------------|--------------------|-----------------------|-------------------|
| Jayson T. Browns | 173103976176 | \$12,500.00 | \$7,324.18 |

In violation of Title 18, United States Code, Section 1344.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. American Heritage Federal Credit Union "AHFCU" was a financial institution whose deposits were insured by the Federal Credit Union Share Insurance Fund.

2. From on or about at least June 14, 2003, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud AHFCU and to obtain monies, funds, credits and other property owned by and under the custody and control of AHFCU by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that:

4. Defendant JASON BROWN opened one account with AHFCU under the name of J. F., a person whose identity was stolen by JASON BROWN.

5. Defendant JASON BROWN fraudulently obtained credit and made fraudulent deposits and payments in the total amount of approximately \$16,646.80 to fund this account. Checks deposited to open and fund the account, in whole or in part, were drawn on accounts that were closed or had never existed. Checks deposited were in the name of J.F. a person whose identity JASON BROWN had stolen.

6. After making fraudulent deposits and fraudulently obtaining credit, defendant JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds.

The approximate total amount of the withdrawals and the approximate total amount of the fraudulent deposits and fraudulently obtained credit at AHFCU are as follows:

| ACCOUNT NAME | ACCOUNT NO. | DEPOSIT/CREDIT | WITHDRAWAL |
|---------------------|--------------------|-----------------------|-------------------|
| J. F. | 101000300590 | \$16,646.00 | \$16,646.00 |

In violation of Title 18, United States Code, Section 1344.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Fleet Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

2. From in or around at least August 2001, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud Fleet Bank and to obtain monies, funds, credits and other property owned by and under the custody and control of Fleet Bank by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that:

4. Defendant JASON BROWN opened two accounts with Fleet Bank under the names of Jayson T. Browns, an alias of JASON BROWN, and R. S., a person whose identity was stolen by JASON BROWN.

5. Defendant JASON BROWN fraudulently obtained credit and made fraudulent deposits in the total amount of approximately \$26,637.38 to fund these accounts. Checks deposited to open and fund the accounts, in whole or in part, were drawn on accounts that were closed or had never existed. Checks deposited were in the name of people whose identity he had stolen or aliases of JASON BROWN.

6. After making fraudulent deposits and fraudulently obtaining credit, defendant

JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds.

The approximate total amount of the withdrawals and the approximate total amount of the fraudulent deposits and fraudulently obtained credit at Fleet Bank are as follows:

| ACCOUNT NAME | ACCOUNT NO. | DEPOSIT/CREDIT | WITHDRAWAL |
|---------------------|--------------------|-----------------------|--------------------|
| R. S. | 72720012168955 | \$18,398.82 | \$18,398.82 |
| Jayson T. Browns | 4170090000028180 | \$8,238.56 | \$8,238.56 |
| | TOTAL | \$26,637.38 | \$26,637.38 |

In violation of Title 18, United States Code, Section 1344.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Bank of America was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

2. From in or around at least August 2001, to on or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JASON BROWN

knowingly executed and attempted to execute a scheme to defraud Bank of America and to obtain monies, funds, credits and other property owned by and under the custody and control of Bank of America by means of false and fraudulent pretenses, representations, and promises.

The Scheme

It was a part of the scheme that:

4. Defendant JASON BROWN opened one account with Bank of America under the name of W. C., a person whose identity was stolen by JASON BROWN.

5. Defendant JASON BROWN fraudulently obtained credit in the total amount of approximately \$8,600 to fund this account.

6. After making fraudulent deposits and fraudulently obtaining credit, defendant JASON BROWN withdrew, or attempted to withdraw, some or all of the fraudulent proceeds. The approximate total amount of the withdrawals and the approximate total amount of the fraudulent deposits and fraudulently obtained credit at Bank of America are as follows:

| ACCOUNT NAME | ACCOUNT NO. | CREDIT | WITHDRAWAL |
|---------------------|--------------------|---------------|-------------------|
| W. C. | 4427103002653169 | \$8,600.00 | \$263.40 |

In violation of Title 18, United States Code, Section 1344.

COUNTS EIGHT THROUGH FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

From on or about the dates listed below for Counts Eight through Forty-Six at Philadelphia, and in the Eastern District of Pennsylvania, defendant

JASON BROWN,

for the purpose of opening bank accounts and to obtain a check cards and other benefits at the PNC Bank, the Philadelphia Federal Credit Union (“PFCU”), E*Trade, and Net Bank and with intent to deceive, falsely represented various social security numbers to be the social security number assigned to him, when in fact, none of those numbers were the social security number assigned to him. JASON BROWN used the following social security numbers to open the accounts below under these names:

| <u>PNC BANK COUNTS</u> | NAME | DATE | ACCOUNT NO. | SOCIAL SECURITY NUMBERS USED - LAST FOUR DIGITS |
|-----------------------------------|------------------|-------------|--------------------|--|
| Count 8 | Jayson Browns | 12/31/03 | 802454833 | 6716 |
| Count 9 | W. C. | 11/21/01 | 8605003227 | 4276 |
| Count 10 | M. C. | 02/10/03 | 11048109621026 | 6717 |
| Count 11 | L. D. | 11/21/03 | 11048109941951 | 6388 |
| Count 12 | A. H. | 06/02/03 | 11048109750812 | 1623 |
| Count 13 | D. K. | 04/23/01 | 8604310583 | 1316 |
| Count 14 | W. K. | 08/23/03 | 11048109847775 | 0611 |
| Count 15 | S. L. | 07/29/03 | 1103048109820312 | 5694 |
| Count 16 | T. L. | 03/05/02 | 8604433161 | 3363 |
| Count 17 | T. P. | 01/29/04 | 6003048110003957 | 9087 |

| | | | | |
|-----------------|-------|----------|------------------|------|
| Count 18 | R. M. | 12/01/03 | 1103048109951091 | 0458 |
| Count 19 | K. S. | 10/18/02 | 11048109505487 | 5222 |
| Count 20 | R. W. | 09/04/01 | 11048109029899 | 9761 |
| Count 21 | R. W. | 07/01/02 | 11048109367258 | 8014 |

| <u>PFCU</u> COUNTS | NAME | DATE | ACCOUNT NO. | SOCIAL SECURITY NUMBERS USED - LAST FOUR DIGITS |
|-------------------------------|-------------|-------------|--------------------|--|
| Count 22 | James Brown | 09/06/02 | 680856 | 2278 |
| Count 23 | Jay Brown | 07/13/02 | 681503 | 7654 |
| Count 24 | T. B. | 01/22/02 | 674038 | 4916 |
| Count 25 | R. C. | 07/26/01 | 669384 | 9799 |
| Count 26 | J. H. | 11/15/02 | 672793 | 3672 |
| Count 27 | D. K. | 04/13/01 | 666516 | 1139 |
| Count 28 | M. O. | 07/29/01 | 669324 | 5625 |
| Count 29 | L. R. | 10/02/02 | 681739 | 1703 |
| Count 30 | R. S. | 10/09/01 | 671938 | 1557 |
| Count 31 | R S. | 07/30/03 | 691648 | 6213 |
| Count 32 | R. W. | 06/21/02 | 678191 | 8014 |

| <u>E*Trade</u> COUNTS | NAME | DATE | ACCOUNT NO. | SOCIAL SECURITY NUMBERS USED - LAST FOUR DIGITS |
|----------------------------------|---------------|-------------|--------------------|--|
| Count 33 | Jayson Browns | 03/27/03 | 2007585330 | 7553 |
| Count 34 | Jayson Browns | 12/01/03 | 63509650544127 | 7553 |

| | | | | |
|-----------------|-------|----------|----------------|------|
| Count 35 | D. B. | 10/15/03 | 2008053346 | 0223 |
| Count 36 | J. H. | 04/24/02 | 2006484634 | 0857 |
| Count 37 | R. R. | 01/22/02 | 2006338251 | 5133 |
| Count 38 | R. S. | 01/01/02 | 63509650017217 | 9750 |
| Count 39 | R. S. | 08/03/03 | 2007952282 | 6213 |
| Count 40 | R. S. | 07/31/03 | 2007967819 | 6213 |

| <u>Net Bank</u> COUNTS | NAME | DATE | ACCOUNT NO. | SOCIAL SECURITY NUMBERS USED - LAST FOUR DIGITS |
|-----------------------------------|-------------|-------------|--------------------|--|
| Count 41 | M. C. | 02/14/03 | 11002091566 | 4943 |
| Count 42 | Z. M. | 11/23/02 | 11001898110 | 5115 |
| Count 43 | R. S. | 04/10/02 | 11001469995 | 9750 |
| Count 44 | J. H. | 04/20/02 | 11001493862 | 0857 |
| Count 45 | A. H. | 06/08/03 | 11002328513 | 1623 |
| Count 46 | M. O. | 03/04/02 | 11001383022 | 5625 |

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

JASON BROWN

knowingly possessed with intent to use unlawfully five or more false identification documents, that is the following licenses and state issued identification cards bearing the picture of defendant JASON BROWN and the names of other people, and thereby affected interstate commerce:

| NAME | TYPE OF IDENTIFICATION |
|------------------|--------------------------------|
| D. A. K. | N.J. Boat Operator license |
| D. J. K. | N.J. Motor Vehicle Services ID |
| D. A. K. | State of New Jersey ID |
| D. J. K. | PA Personal ID Card |
| P. J. R. | N.J. Motor Vehicle Services ID |
| J. S. J | N.J. Motor Vehicle Services ID |
| Jayson T. Browns | Delaware Driver's License |

In violation of Title 18, United States Code, Sections 1028(a)(3), (b)(2)(B) and (c)(3)(A).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

In committing the offenses charged in Counts One through Forty-Seven of this indictment, defendant JASON BROWN:

1. Committed offenses in which the loss exceeded \$400,000 as described in U.S.S.G. § 2B1.1(b)(1).
2. Committed offenses involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).
3. Committed an offense in which the defendant relocated, and participated in relocating, a fraudulent scheme to another jurisdiction to evade law enforcement and regulatory officials, as described in U.S.S.G. § 2B1.1(b)(8).
4. Committed an offense involving the unauthorized transfer and use of any means of identification unlawfully to produce and obtain any other means of identification, as described in U.S.S.G. § 2B1.1(b)(9)(C)(i).
5. Committed an offense involving the possession of 5 or more means of identification that unlawfully were produced from, and obtained by the use of, another means of identification, as described in U.S.S.G. § 2B1.1(b)(9)(C)(ii).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney